

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

William Rock Plaintiff	:	Civil No.1:11-CV-01839
	:	
V.	:	(Judge Rambo)
Donna asure, Deborah Wilson Grace Ramos-Huertes Defendants	:	(Magistrate Judge Smyser)
	:	

**FILED
SCRANTON**

JUN 20 2012

PLAINTIFFS BREIF IN SUPPORT OF MOTION
FOR LEAVE TO FILE AMENDED COMPLAINT

PER W. E. S.
DEPUTY CLERK

Plaintiff William Rock, pro se, respectfully requests that this Honorable Court to grant leave to file amended complaint so that following may be added.

1. Dee Reiss secratary of PrimeCare Medical inc., Who was aware that Plaintiff was ordered to see a specialist within 5 days of his injury (by October 16th,2009),but chose to wait untill October 23rd,2009 to schedule an appointment with no regard to Plaintiffs serious medical needs. Plaintiff had an appointment for November 4th 2009 to see a specialist but that appointment needed to be canceled on October 29th,2009 (6 days before) due to an emergency at the institution. Ms Reiss did not follow the doctors orders and due to her deliberate indifference of Plaintiffs serious Medical Needs the Plaintiff was forced to endure extreme pain,was unable to use his hand and lost a body part.

2. Paul James LPN, who was aware of Plaintiffs serious medical condition and was to inform the institution that the Plaintiff was being transferred to of his present medical condition but chose not to. On the transfer health sheet he filled out and sent as to current acute health problems he wrote R elbow pain, as to other treatment, he wrote N/A, as to follow up care needed, he wrote N/A, as to other significant medical history, he wrote N/A, as to physical disabilities, he wrote N/A (left ankle surg x3). James should never allowed Plaintiff to be transferred in his condition and due to James not sending the correct medical information resulted in a major delay of the emergency medical treatment that the Plaintiff was in dire need of.

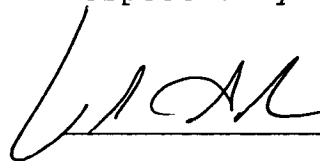
3. Gary McFarland/Richard Cuth of the Monroe County Correctional Facility chose to wait 3 days to look at Plaintiffs grievance and were aware the day before he was transferred that he was in need of emergency medical treatment but decided to let him become someone else's problem with blatant disregard to Plaintiffs medical needs, safety and well being. Nor did they answer the grievance correctly or ever send original copy of their response to the Plaintiff.

4. PrimeCare inc., PrimeCare and Associates, PrimeCare Medical. It was the provider who directed that the Plaintiff only receive (1) Tylenol #3 every eight hours for pain when he was perscribed to receive 1-2 Tabs every 4 hours as needed. And they did not properly train their staff to deal with situations (like the Plaintiffs) properly. Staff should not be directed to dis-reguard orders made by a doctor concerning perscriptions/ treatment, and should have been trained to make sure that serious medical needs are met and not redirected to someone else, and how to send proper information pertaining to serious medical needs. All of which led to deliberate indiffrence of Plaintiffs serious medical needs. And likely to happen again.

5. Monroe County Correctional Facility for failure to train their staff to deal with situations (like the Plaintiffs) properly. Staff waited until they knew that the Plaintiff was being transfered to address his grievance concerning a serious medical need. Since it was concerning a serious medical need it should have been addressed on November 3rd 2009 (the day it was recieved) not 2 days later. And knowingly allowing an inmate to be transfered in need of emergency medical treatment. All resulted in plaintiff losing a body part as well as leaving the Plaintiff in extreme pain and unable to use his left hand and proves deliberate indiffrence of Plaintiffs serious medical needs. And likely to happen again.

Therefore, based on the information just recieved
the Plaintiff prays that this Honorable Court grant his motion
for leave to file amended complaint.

Respectfully Submitted

 6-17-12

William Rock, pro se
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CERTIFICATE OF SERVICE

I, William Rock, pro se, hereby certify that on this
17th day of June, 2012 have served a true and correct copy of
"PLAINTIFFS BRIEF IN SUPPORT OF MOTION FOR LEAVE TO FILE AMENDED
COMPLAINT" upon the parties named below. This service was
effectuated by First Class U.S. Mail, delivered to officials at
S.C.I. Houtzdale for proper postage and mailing. I also invoke
prisoners mail box rule on said brief.

Mary E. D'Andrea
235 North Washington Ave.
P.O. Box 1148
Scranton Pa. 18501-5650

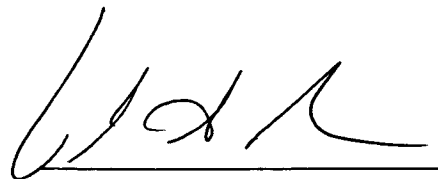
One (1) Original
And Two (2) Copies

Gerard Geiger/Robert Kidwell
712 Monroe St.
P.O. Box 511
Stroudsburg Pa. 18360-0511

One (1) Copy

John Ninosky
301 Market St.
P.O. Box 109
Lemoyne Pa. 17043

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JUN 20 2012

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